Section 1. Registration Information

Source Identification

Facility Name:	Advanced Biotech
Parent Company #1 Name:	Centrome, Inc.
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	First-time submission
Subsequent RMP Submission Reason:	
Description:	
Receipt Date:	10-Aug-2018
Postmark Date:	10-Aug-2018
Next Due Date:	10-Aug-2023
Completeness Check Date:	10-Aug-2018
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	

Facility Identification

EPA Facility Identifier:	1000 0022 0245
Other EPA Systems Facility ID:	
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	
Parent Company #1 DUNS:	830994182
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	10 Taft Rd
Street 2:	
City:	Totowa
State:	NEW JERSEY
ZIP:	07512
ZIP4:	
County:	PASSAIC

Facility Latitude and Longitude

Latitude (decimal):	40.905529
Longitude (decimal):	-74.247826
Lat/Long Method:	GPS - Unspecified
Lat/Long Description:	Administrative Building
Horizontal Accuracy Measure:	5
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	

Owner or Operator

Operator Name:	Centrome Inc.
Operator Phone:	(973) 339-6242

Mailing Address

Operator Street 1:	10 Taft Road
Operator Street 2:	
Operator City:	Totowa
Operator State:	NEW JERSEY
Operator ZIP:	07512
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Thomas DelMastro
RMP Title of Person or Position:	Vice President
RMP E-mail Address:	tdelmastro@adv-bio.com

Emergency Contact

Emergency Contact Name:	Thomas DelMastro, PhD
Emergency Contact Title:	Vice President
Emergency Contact Phone:	(973) 339-6242
Emergency Contact 24-Hour Phone:	(973) 466-0523
Emergency Contact Ext. or PIN:	N/A
Emergency Contact E-mail Address:	tdelmastro@adv-bio.com

Other Points of Contact

Facility or Parent Company E-mail Address:	info@adv-bio.com
Facility Public Contact Phone:	(973) 339-6242
Facility or Parent Company WWW Homepage Address:	http://www.adv-bio.com/

Local Emergency Planning Committee

LEPC:	Totowa Boro OEM

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	110
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	

Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	09-Jul-2018
Last Safety Inspection Performed By an External Agency:	State occupational safety agency

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:	Pleasant Hill Consultants, Inc.
Preparer Phone:	(973) 927-0346
Preparer Street 1:	34 Pleasant Hill Rd.
Preparer Street 2:	
Preparer City:	Succasunna
Preparer State:	NEW JERSEY
Preparer ZIP:	07876
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000039419
Description:	Storage, blending, pkging
Process Chemical ID:	1000047363
Program Level:	Program Level 3 process
Chemical Name:	Acetaldehyde
CAS Number:	75-07-0
Quantity (lbs):	100000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process NAICS

Process ID:	1000039419
Process NAICS ID:	1000039801
Program Level:	Program Level 3 process
NAICS Code:	325199
NAICS Description:	All Other Basic Organic Chemical Manufacturing

Section 2. Toxics: Worst Case

No records found.

Section 3. Toxics: Alternative Release

No records found.

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000024429

Model Used:	EPA's RMP*Comp(TM)
Endpoint used:	1 PSI

Passive Mitigation Considered

Blast Walls:	
Other Type:	

Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000022851

Model Used: EPA's RMP*Comp(TM)

Passive Mitigation Considered

Dikes:
Fire Walls:
Blast Walls:
Enclosures:
Other Type:

Active Mitigation Considered

Sprinkler System:
Deluge System:
Water Curtain:
Excess Flow Valve:
Other Type:

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

No description available.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000040701
Chemical Name:	Acetaldehyde
Flammable/Toxic:	Flammable
CAS Number:	75-07-0

Process ID:	1000039419
Description:	Storage, blending, pkging
Prevention Program Level 3 ID:	1000034420
NAICS Code:	325199

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	03-Jul-2018

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	03-Jul-2018

The Technique Used

What If:	
Checklist:	
What If/Checklist:	Yes
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	03-Jul-2018

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	
Overfilling:	Yes
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes

Earthquake:	
Floods (Flood Plain):	Yes
Tornado:	
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	
Check Valves:	
Scrubbers:	Yes
Flares:	
Manual Shutoffs:	
Automatic Shutoffs:	
Interlocks:	
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	Yes
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	
Fire Walls:	
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	Yes
Neutralization:	
None:	
Other Mitigation System in Use:	High flow rate exhaust system

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	Yes
Change Process Parameters:	

Installation of Process Controls:	
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	29-Jun-2018

Training

Training Revision Date (The date of the most recent review or revision of training programs):	28-Jun-2018

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	
Oral Tests:	
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	29-Jun-2018
Equipment Inspection Date (The date of the most recent equipment inspection or test):	29-Jun-2018
Equipment Tested (Equipment most recently inspected or tested):	RMP Equipment is inspected each day of operation. All equipmemnt inspected monthly

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	09-Jul-2018
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	07-Mar-2018

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	24-Jul-2018

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	09-Jul-2018
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	08-Aug-2018

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	09-Jul-2018

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	06-Jan-2017

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	11-Jan-2017
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	19-Jul-2017

Confidential Business Information

CBI Claimed:	

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	03-Jul-2018

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	12-Feb-2018

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Totowa OEM
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(973) 890-7300

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	Yes
Clean Water Regulations at 40 CFR 112:	
RCRA Regulations at CFR 264, 265, and 279.52:	Yes
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	

Executive Summary

Executive Summary - Acetaldehyde Storage and Handling

Acetaldehyde Storage and Handling

Acetaldehyde is handled as a liquid cooled to 50°F (approximately 20°F below its boiling point) to minimize vapor generation and the subsequent potential fire hazard. This sub-cooling is achieved by the use of the refrigerators within the facility. Incoming drums for acetaldehyde are pressure rated and certified to the pressure rating required for the material.

Security

Procedural and physical security measures are in place to deter, detect and delay a threat. The complete security plan is outlined and discussed in the Advanced Biotech Security Plan and is considered confidential. Some highlights of the plan include: adequate illumination of the site; fencing to prevent unauthorized entry, secured gates on off hours; surveillance cameras; limited door/gate access; controlled access levels throughout the facility; etc.

Summary of Security Plan

The facility is located on a roughly triangular property site. Its perimeter is fenced on the South side, bordered by the Signac Brook (aka Nuachtpunk Creek) on the Northeast side and Amtrak Right-of-Way on the Northwest side.

Site access security is maintained by a front gate which is locked during non-business hours. Facility access security is maintained via locked exterior personnel and shipping/receiving overhead doors. Visitors are required to enter through the front entrance and sign in with the receptionist. No unescorted visitors are permitted in the material storage, operations or production areas. Delivery and shipment drivers check in with their respective loading docks for access to loading docks.

The Diesel Fuel storage tank and shipping and receiving areas employ continuous evening lighting activated automatically by photoelectric sensors. This in combination with the fence serves to minimize the threat of vandalism in the tank area and the rest of the facility. Lighting also allows for evening detection of spills or leaks.

Exterior storage tanks are secured to prevent draining or spills due to vandalism.

The following is a list of some of the areas that are monitored 24/7/365 via a digital video camera system with long-term recording capability:

Front entrance gate
Property line/perimeter/Amtrak right-of-way
Front and rear employee parking areas
Emergency assembly area
Visitor parking area
Loading dock aprons/tertiary containment areas
Exterior access to shipping/receiving areas - overhead and personnel doors
Firewater tank and fire-retardant foam system building
Standby Generator and integral diesel fuel tank/containment
Carbon adsorption systems - fans/motors/dampers/ductwork
Exterior office doors; exterior operations area doors
Exterior emergency exits
Interior access to operations, shipping/receiving, DEA cage areas
Flammables drum rack
Production area - flammables handling

Display screens enable management personnel to continuously monitor these areas. The camera surveillance is also recorded for later review as needed.

Spill Prevention

Spill prevention and abatement means utilized at ABT include verified leak-proof container closures and valves, secondary containment infrastructure in all areas of the facility as well as spill kits and absorbent materials at strategic locations. The site operates with 'zero discharge' from Production, Pouring, QC Lab, Warehouse and Shipping/Receiving. The site is considered a major facility by the NJDEP and as such has a Discharge Prevention Containment and Countermeasure and a Discharge Cleanup and Removal Plan approved August 5, 2013 and reauthorized August 8, 2016.

HVAC and VOC Removal

Building heating, cooling and ventilation systems are sized to provide the appropriate air flow and velocities necessary for the flammability class of Acetaldehyde. Low point exhaust s are located throughout the facility due to its 1.52 vapor density (Air = 1.0). Over 30,000 CFM of air flow is provided as an exhaust to two activated carbon adsorption systems which remove >99% of the VOC present.

Sprinkler and Fire Protection

ABT's facility is fully sprinklered at the correct density and coverage for the materials stored including Acetaldehyde. A separate

supplemental system is provided for the drum racks. The sprinkler system is sourced from an on-site carbon steel 100,000 gallon firewater tank. An additional 615 gallon tank contains a non-hazardous foam concentrate (Alcohol-Resistant Aqueous Film-Forming Foam) to improve the fire control and suppression capabilities of the sprinkler system.

Accidental Release Prevention and Response Policies and Procedures

Advanced Biotech, Inc. (ABT) has made an Executive Management commitment to prevent and control spills and releases demonstrated by implementation of a comprehensive Discharge Prevention and Countermeasure Plan (DPCC) and Discharge Cleanup and Removal (DCR) Plan. Substantial resources have addressed personnel training, accident/spill prevention and considerations for safety in the design, installation, operation and maintenance of equipment. Advanced Biotech, Inc.'s policy is to implement reasonable controls to prevent foreseeable releases of regulated substances for both worker and public safety. The following operating procedures specifically apply to the covered Acetaldehyde process (Attachment 7-A):

SOP 2 - Acetaldehyde Handling
SOP 11 - Chemical Control
SOP 46 - Mix and Fill
SOP 47 - Mixing Production Operations
SOP 55 - Products needing Ventilation
SOP 62 - Refrigeration and Refrigerated Products
SOP 79 - Acetaldehyde Blend Preparation
SOP 80 - Acetaldehyde Blend Filtration for Shipment
SOP 89 - Employee Participation Procedure (DPCC/DCR; PSM, RMP/TCPA)

Description of the Stationary Source and Regulated Substances

ABT is located on Taft Road in Totowa Borough, Passaic County, New Jersey and has one regulated substance, acetaldehyde. Acetaldehyde is purchased as a raw material. Some material is shipped directly to customers and some is custom weighed, blended, dispensed and repackaged for commercial sale.

Offsite Consequence Analysis

For ABT at, the potential worst-case toxic release scenario involves the entire contents of three pallets of 55 gallon Acetaldehyde drums. The Environmental Protection Agency's (EPA) RMP*Comp model was used to determine that the distance to toxic/flammable endpoint for such a release is less than 0.1 miles and does not affect any public or environmental receptors. The storage facility is equipped with a tertiary containment to contain spills and prevent discharge to the environment.

Process Safety Information

ABT has developed a variety of technical documents that will be used to help maintain safe operation of the acetaldehyde operation. These documents address chemical properties and associated hazards, limits for key process parameters, specific chemical inventories, and equipment design basis/configuration information. Chemical-specific information, including exposure hazards, and emergency response/exposure treatment considerations are provided in safety data sheets (SDSs). Chemical storage containers and handling equipment for acetaldehyde storage and operations have been selected for chemical/physical compatibility meeting DOT and IMDG requirements.

ABT has written procedures that address various phases of operations, such as receipt, inspection/testing, storage, dispensing, use and packing/shipping. These procedures are used as a reference by experienced operators and provide a basis for consistent training of new operators. These procedures are periodically reviewed and maintained as current and accurate.

Training

To complement the written procedures for operations, Advanced Biotech, Inc. has implemented a specific training program for all employees potentially involved in working with acetaldehyde. All training is been documented for each operator, supervisors verify that the operators understood the training.

Maintenance

Advanced Biotech, Inc. has developed procedures to maintain its facilities in a safe operating condition. Maintenance personnel have received training on (1) an overview of the process, (2) safety and health hazards, (3) applicable maintenance procedures, (4) emergency response plans, and (5) applicable safe work practices to help ensure they can perform jobs in a safe manner.

Five-Year Accident History

Advanced Biotech, Inc. has no ACETALDEHYDE accidents in the past 5 years.

Emergency Response Program Information

Advanced Biotech, Inc. maintains a written emergency response program, which is in place to protect worker and public safety as well as the environment. Employees receive training in these procedures as necessary to perform their specific emergency response duties. The emergency response program is updated when necessary based on modifications made to the operations or the processes. The overall emergency response program for ABT is coordinated with the Local Emergency Planning Committee (LEPC).

Safety

Advanced Biotech, Inc. strives for continuous improvement in its safety programs. Including training employees to safely perform assigned tasks and encouraging employees to suggest changes or improvements that will help improve safety and performance. Preventative maintenance is performed to minimize the potential for unanticipated failure of operating equipment.

Advanced Biotech, Inc. continuously reviews and updates prevention program elements, including written operating procedures, mechanical integrity programs, and the emergency response plan. Recommendations identified during the process hazard review of the acetaldehyde equipment and procedures have been incorporated.